

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**In re: BINGTUAN YIN and XIANGLING KONG**  
**Debtors**

**Case No. 21-10653-KHK**  
**Chapter 7**

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**TRINA BENGTTSSON**

**Plaintiff,**

**v.**

**Adv. Pro. No. 21-01043-KHK**

**BINGTUAN YIN**  
**XIANGLING KONG**

**Defendants.**

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**DEFENDANTS RULE 7026(a)(1) DISCLOSURES**

The Defendants, Bingtuan Yin and Xiangling Kong (the “Defendants”), by counsel, and pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure (incorporated in adversary proceedings pursuant to Rule 7026 of the Federal Rules of Bankruptcy Procedure), and the Pretrial order entered by the Court, provide the following initial disclosures to Trina Bengtsson (the “Plaintiff”).

**I. Rule 26(a)(1)(A)(i) – Name of individuals likely to have discoverable information**

With relation to the factual allegations of the Complaint and the Plaintiff’s Claim that the debt at issue is non-dischargeable, the Defendant discloses the following individuals who may have discoverable information that may support the Defendant’s defenses.

1. Bingtuan Yin - One of the Defendants and Debtors in this case, who has

Barry W. Spear (VSB #39152)  
Veronica Brown-Moseley (VSB #87348)  
Kathryne Mary Rose Shaw (VSB #89561)  
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Convergence Center III  
272 Bendix Rd., Suite 330  
Virginia Beach, VA 23452  
Telephone (757) 313-3000  
Counsel for Defendants/Debtors

knowledge and information relating to the claims of the Plaintiff and his defenses thereto. In addition, he has knowledge of the state court litigation, including the trial, the appeal, and the collection proceedings in Fairfax Circuit Court.

Bingtuan Yin.  
c/o Barry Spear  
Boleman Law Firm, P.C.  
272 Bendix Road, Suite 330  
Virginia Beach, VA 23452

2. Xiangling Kong - One of the Defendants and Debtors in this case, who has knowledge and information relating to the claims of the Plaintiff and her defenses thereto. In addition, she has knowledge of the state court litigation, including the trial, the appeal, and the collection proceedings in Fairfax Circuit Court.

Xiangling Kong  
c/o Barry Spear  
Boleman Law Firm, P.C.  
272 Bendix Road, Suite 330  
Virginia Beach, VA 23452

3. Trina Bengtsson – The Plaintiff in this case, who has knowledge and information relating to her claims against the Defendants and has knowledge and information relating to the interactions between herself and the Defendants. In addition, she has knowledge of the state court litigation, including the trial, the appeal, and collection efforts through the Fairfax Circuit Court.

Trina Bengtsson  
c/o Andrea C. Davison, Esquire  
Bean, Kinney & Korman, P.C.  
2311 Wilson Blvd., Suite 500  
Arlington, VA 22201

4. Mei Lei – A former employee of the Sunnyworld. Believed to be the “agent” of the Defendants referred to in the Plaintiff’s Complaint. She would have

knowledge as to her interactions with the Plaintiff and the Defendants. Her current phone number and address are unknown at this time, but will be provided through discovery to the extent that it is reasonably obtainable.

The Defendant reserves the right to supplement this as additional information may be obtained through discovery.

**II. RULE 26(a)(1)(A)(ii) – Documents or items in possession, custody, or control of Defendants that Defendants may use to support his claims and/or defenses**

1. All Pleadings, Motions, Briefs, Jury Instructions, Affidavits, Transcripts, Orders and any other materials contained in the record of the Superior Court of Washington for King County.
2. All Pleadings, Motions, Transcripts, and Orders contained in the record of the proceeding in the Court of Appeals for the State of Washington.
3. Transcripts of all depositions taken in connection with the proceedings in the Superior Court of Washington for King County.
4. All records of the Fairfax Circuit Court related to the collection proceedings and Show Cause against the Defendants.

**III. RULE 26(a)(1)(A)(iii) – Computation of Damages**

The Plaintiff's Complaint seeks to have the Plaintiff's claim of \$857,447.53 declared non-dischargeable. These amounts have been determined by Courts of competent jurisdiction and further computation is not required beyond an accurate accounting that any amounts collected through garnishment have been properly accounted for. However, Defendants do contend that that amount should not be determined to be non-dischargeable pursuant to 11

U.S.C. § 523(a)(6). Further, should the debt be determined to be non-dischargeable, the Defendants reserve the right to contest the calculation of interest.

**IV. RULE 26(a)(1)(A)(iv) - Insurance Agreements**

The Defendants are not aware of any relevant insurance contracts.

**BINGTUAN YIN**  
**XIANGLINE KONG**  
By Counsel:

/s/ Barry W. Spear  
Barry W. Spear (VSB #39152)  
Veronica Brown-Moseley (VSB #87348)  
Kathryne Mary Rose Shaw (VSB #89561)  
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Counsel for Defendants/Debtors

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Rule 7026 Disclosures was sent via CM/ECF to Andrea C. Davison, Counsel for Plaintiff, on September 3, 2021.

/s/ Barry W. Spear  
Counsel for Defendants/Debtors